

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In Re:

Case No. GG 12-00539

**MICHAEL R. SNOW, and
ERNESTINA SNOW,**

Chapter 7; Filed: 1/26/12

Debtors.

Honorable James D. Gregg

MOTION TO COMPEL TURNOVER

NOW COMES Chapter 7 Trustee Jeff A. Moyer ("Trustee"), by and through his attorneys, The Bankruptcy Group, Inc., and states as his Motion to Compel Turnover to the Court the following:

1. On January 26, 2012, Michael R. Snow and Ernestina Snow ("Debtors" or "Snows") filed a voluntary Chapter 7 petition for relief under the Bankruptcy Code.
2. Jeff A. Moyer ("Trustee" or "Movant") is the duly-appointed, qualified and acting Chapter 7 Trustee in this case.
3. The Trustee requests turnover from Mr. and Mrs. Snow the amount of \$1,129.15 representing the non-exempt portion of their 2011 IRS tax refund. The Trustee requests turnover of those tax refunds for the benefit of their bankruptcy creditors.
4. The personal property involved is not of inconsequential value nor without benefit to the estate.
5. Mr. and Mrs. Snow are required to turn over the funds in question to the Trustee and have not yet done so.

WHEREFORE, Trustee Jeff A. Moyer requests this Court to enter an Order granting the following relief:

- A. Requiring the immediate turnover by Mr. and Mrs. Snow the amount of \$1,129.15 representing the non-exempt portion of their 2011 IRS and State tax refunds; and
- B. Grant such other or further relief as this Court deems just and proper.

Respectfully submitted,

THE BANKRUPTCY GROUP, INC.
Attorneys for Trustee Jeff A. Moyer

Dated: January 16, 2014

By: 

Jeff A. Moyer (P44671)

Business Address:

P.O. Box 337

Grandville, MI 49468-0337

(616) 532-4002